

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JOSEPH A. COCHRAN, JR.,)
)
Plaintiff,) C.A. No.: 06-697 JJF
)
v.)
)
JAMES W. REED and)
J. B. HUNT TRANSPORT, INC.,) TRIAL BY JURY DEMANDED
)
Defendants.)

PLAINTIFF'S MOTION TO EXTEND DEADLINE TO IDENTIFY AN ECONOMIC EXPERT

Plaintiff, by and through his undersigned counsel, hereby move to extend the deadline for Plaintiff to identify an economic expert through and including November 30, 2007:

1. This Court entered a case scheduling order requiring that Plaintiff produce report or retain experts required by Federal Rules of Civil Procedure 26(a)(2) by October 12, 2007. The Plaintiff produced a report from Plaintiff's treating physician, Dr. Cucazella, regarding the nature and extent of claimant's injuries.

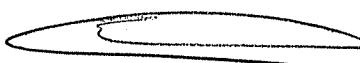
2. The Plaintiff was deposed on October 31, 2007. During his deposition, the Plaintiff testified that he will not be returned to his reserve unit in the United States Marines due to disability resulting from the accident at issue in this case. Although the Marines have not completed the paperwork discharging him for medical reasons, Plaintiff testified that he expects to be discharged soon.

3. Plaintiff's counsel now seeks leave from the Court for 30 days to retain and disclose an economic report from the claimant for lost wages arising out of his inability to return to his unit in the Marines.

4. Pursuant to Delaware Local Rule 7.1.1, Plaintiff's counsel requested that defense counsel agree to the relief sought in this motion. Defense counsel declined to do so.

5. There is no prejudice to the Defendants as Plaintiff's counsel will provide the economic report to Defense counsel in advance of Defense's counsel deadline to disclose its experts. In the unlikely event Defense counsel obtains a rebuttal economic report, Plaintiff's counsel submits that the Defense's deadline to do so could be extended to accommodate Plaintiff's request. There is currently no trial date scheduled and the pre-trial conference is not scheduled to occur until April 10, 2008.

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Dated: 11/2/07

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CERTIFICATE OF SERVICE

I, Timothy E. Lengkeek, Esquire, hereby certify that on this 2nd day of November, 2007, I caused copies of the foregoing document, Plaintiff's Motion to Extend Deadline to Identify an Economic Expert, Proposed Order and this Certificate, to be served on the following individual, in the manner indicated below:

BY HAND DELIVERY

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Attorney for Plaintiff

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ORDER

Upon review of the Plaintiff's motion and any response thereto, it is hereby ordered that Plaintiff has until November 30, 2007 to produce an economic report related to the Plaintiff's partial wage loss.

IT IS SO ORDERED, this _____ day of _____, 2007.

Judge